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14							
15	UNITED STATES DISTRICT COURT						
16	NORTHERN DISTRICT OF CALIFORNIA						
17							
18	FASTCAP, LLC and PAUL AKERS	CASE NO. CO8-05364 EDL					
18 19	FASTCAP, LLC and PAUL AKERS Plaintiffs,						
18 19 20		STIPULATION REGARDING EXTENSION OF TIME TO_					
18 19 20 21	Plaintiffs, vs.	STIPULATION REGARDING					
18 19 20 21 22	Plaintiffs,	STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO COMPLAINT; [PROPOSED] ORDER THEREON					
18 19 20 21 22 23	Plaintiffs, vs. ATLANTIC, INC. and JAMES DARDASHTI,	STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO COMPLAINT; [PROPOSED] ORDER THEREON [Local Rule 6-2(a)]					
18 19 20 21 22 23 24	Plaintiffs, vs. ATLANTIC, INC. and JAMES	STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO COMPLAINT; [PROPOSED] ORDER THEREON					
18 19 20 21 22 23 24 25	Plaintiffs, vs. ATLANTIC, INC. and JAMES DARDASHTI,	STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO COMPLAINT; [PROPOSED] ORDER THEREON [Local Rule 6-2(a)] [Declaration of Daniel M. Cislo					
18 19 20 21 22 23 24	Plaintiffs, vs. ATLANTIC, INC. and JAMES DARDASHTI,	STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO COMPLAINT; [PROPOSED] ORDER THEREON [Local Rule 6-2(a)] [Declaration of Daniel M. Cislo					
18 19 20 21 22 23 24 25 26	Plaintiffs, vs. ATLANTIC, INC. and JAMES DARDASHTI,	STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO COMPLAINT; [PROPOSED] ORDER THEREON [Local Rule 6-2(a)] [Declaration of Daniel M. Cislo					

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STIPULATION

WHEREAS, Defendants Atlantic, Inc. and James Dardashti (collectively referred to as "Atlantic") were served with the Complaint on or about January 12, 2009;

WHEREAS, Atlantic's response to the Complaint, which will be its first pleading in this case, is due on or about February 2, 2009;

WHEREAS, the parties intend to discuss settlement of this matter in the additional period of time that a thirty-day extension of time would provide;

WHEREAS, Atlantic has not requested the additional time to respond to the Complaint for purposes of delay;

WHEREAS, counsel for Plaintiffs FastCap, LLC and Paul Akers (collectively referred to as "FastCap") has consented to an extension of time until March 2, 2009 for Atlantic to respond or otherwise plead in response to the Complaint;

NOW THEREFORE, FastCap and Atlantic by and through their counsel of record, hereby agree and stipulate that Atlantic shall have until March 2, 2009 to respond or otherwise plead in response to the Complaint.

Accordingly, the Order Setting Initial Case Management Conference and ADR Deadlines in this case are agreed by the parties to be changed as follows:

1 2 3	3/10/2009	meet and confer re: ii	3	FRCivP_26(f)&ADR L.R.3-5
5		file ADR Certificatio Counsel	n signed by Parties and	Civil_L.R. 16-8 (b) & ADR L.R. 3-5(b)
7 8		· ·		Civil_L.R. 16-8(c) & ADR L.R. 3-5(b) & (c)
9 10 11 12	3/24/2009	initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re		FRCivP26(a) (1) Civil_L.R. 16-9
13 14	4/3/2009	INITIAL CASE MANA	GEMENT	Civil_L.R. 16-10
15 16	ZIMMERMAN & CRONEN, LLP		CISLO & THO	MAS LLP
17 18 19		•	By: Daniel M. C Mark D. Nie	•
202122	,	·	Attorneys for Do ATLANTIC, IN DARDASHTI	
23 24	Dated: Janu	uary, 2009 Dated: January		, 2009
25 26			IT IS SO ORDERED.	
27 28	Dated: Janu	uary, 2009	HONORABLE ELIZA United States Magistrat	
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	2 3 4 4 5 6 7 7 8 9 3/24/2009 10 11 12 13 4/3/2009 14 15 16 ZIMMERN 17 18 Harris Z 19 Michael 20 Attorneys f FASTCAP AKERS 21 Dated: January 22 23 Dated: January 24 25 26 27 Dated: January 26 27 Dated: January 27 28 28 28 28 28 28 28	 meet and confer re: in settlement, ADR prodiscovery plan file ADR Certification Counsel file either Stipulation Notice of Need for A Conference 3/24/2009 Last day to file Rule 26(initial disclosures or stat 26(f) Report and file Car Statement per attached Statem	• meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan • file ADR Certification signed by Parties and Counsel • file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference 3/24/2009 10 12 13 14 15 16 17 18 18 19 19 10 11 12 11 12 12 13 14 15 15 16 17 18 18 18 19 18 19 18 19 10 17 18 18 19 10 10 11 12 12 13 14 15 15 16 17 18 18 19 18 19 19 10 10 11 12 12 13 14 15 16 17 18 18 19 18 19 19 19 10 10 11 12 12 13 14 15 16 17 18 18 19 18 19 1

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	1 2 3	3/10/2009		: initial disclosures, early process selection, and	FRCivP 26(t)&ADR L.R.3-5
	4 5 6		file ADR Certification Counsel	tion signed by Parties and	Civil L.R. 16-8 (b) & ADR L.R. 3-5(b)
	7 8		 file either Stipulation Notice of Need for Conference 	on to ADR Process or r ADR Phone	Civil L.R. 16-8(c) & ADR L.R. 3-5(b) & (c)
. p 	9 10 11	3/24/2009	initial disclosures or s 26(f) Report and file (Statement per attached	Case Management I Standing Order re	FRCivP26(a) (1) Civil L.R. 16-9
THOMAS LINES SO SE SYREE SOO SE" SYREE SOO ALFORNIA OOAOI FACSHILL FACSHILL FACSHILL CON	12 13 14	4/3/2009	INITIAL CASE MAN	Management Statement NAGEMENT C) in Ctrm E, 15th Floor,	Civil L.R. 16-10
CISLO & SKILLO & SKILLO & SANTA MONICA, DI 1031 451-0647	15 16 17	ZIMMERN	IAN & PROMEN, IM	CISLO & THO	MAS LLP
C.I. SANTA TELEPHONE: (3.10) 4	18 19		Simmerman, Esq. James Cronen, Esq.	By/Daniel M. C Mark D. Nie	- 1
	202122	_	or Plaintiff, , LLC and PAUL	Attorneys for D ATLANTIC, IN DARDASHTI	
	23 24	Dated: Janu	uary <u>/ </u>	Dated: January	17, 2009
	252627	Dated: Janu	uary ²⁶ , 2009	IT IS SO ORDERED.	
	28		· · · · · · · · · · · · · · · · · · ·	HONORABLE DUDITED AND DESCRIPTION OF THE STATE OF THE STA	BETH D. LAPORTE udge